



# California Regional Water Quality Control Board

## Santa Ana Region



Terry Tamminen  
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Arnold Schwarzenegger  
Governor

July 29, 2004

Lieutenant General Robert B. Flowers, Commanding  
HQ US Army Corps of Engineers  
ATTN: CECG  
441 G Street, NW  
Washington, DC 20314-1000

Colonel Richard G. Thompson, Commanding  
U.S. Army Corps of Engineers  
Los Angeles District  
911 Wilshire Blvd.  
Los Angeles, CA 90017-3401

### COMMENTS ON "FINAL REPORT, OPERATIONAL HISTORY 1941-1945, RIALTO AMMUNITION BACK-UP STORAGE POINT" (RASP) - CITY OF RIALTO, SAN BERNARDINO COUNTY, CALIFORNIA

Dear Lt. Gen. Flowers and Col. Thompson:

We have reviewed the above-referenced report (Final Report), dated January 2004, which we received on February 26, 2004. The report was submitted on your behalf by your contractor, SAIC, in response to the October 24, 2002 Investigation Order that was issued by the Executive Officer of the Board, pursuant to California Water Code Section 13267. The U.S. Army Corps of Engineers (U.S. ACE) chose to provide the Final Report in lieu of the required site investigation work plan that was due on November 25, 2002.

Your Final Report concludes that:

- The RASP operated as a temporary storage facility for ordnance-loaded railcars in transit to the Los Angeles Port of Embarkation during World War II, and for storage of small arms ammunition for troops of the Army Ground Forces training in the Mojave Desert. The small arms ammunition contained little or no perchlorate.
- There is no evidence of ordnance manufacture, treatment or disposal, or evidence of any shipment of pyrotechnics through the RASP.
- Less than 10% of the 3.5 million tons of munitions transported to the Los Angeles Port of Embarkation was routed through the RASP.
- Munitions were typically stored in the railcars and remained there for inspection.
- There was a low frequency of handling munitions at the RASP, and the probability of accidental release of perchlorate was low.

Based on our review of the Final Report, and our staff's additional research and discussions with outside parties regarding the RASP, it appears that the information in the Final Report, as

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relied upon by the U.S. ACE and its contractor, SAIC, for the above listed conclusions, is incomplete.

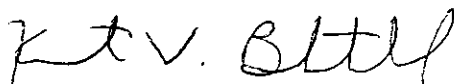
Our staff has reviewed additional information and records of the operational history of the RASP that were provided to us by representatives of the City of Rialto. The additional records indicate that:

- Approximately 200,000 tons of explosives, ordnance and ammunition (8,000 railcars, carrying 25 tons per car) moved through the RASP in a 3-year period.
- An estimated 5% of the total 200,000 tons (that is, 10,000 tons or 20 million pounds) of military products containing perchlorate passed through the RASP. Examples of some of the specific products that were shipped to and stored at the RASP included: 81 millimeter mortar projectiles, containing over 12% potassium perchlorate; 22 millimeter cartridges containing 36% potassium perchlorate; 35 millimeter rockets containing 64% potassium perchlorate in the flash mix and 8% in the projectile; and 40 millimeter grenades containing 68% potassium perchlorate.
- A total of 7,446 tons of ammunition was returned from overseas to the Los Angeles Port of Embarkation between January 1944 and June 1945. Of this total tonnage, all damaged material was sent to the RASP facility to be "recoopered or destroyed."

It is evident from this additional information that there is a more than adequate basis for suspicion that one or more releases of perchlorate salts could have occurred during the extensive operations that took place at the RASP site. Furthermore, the U.S. ACE's submittal of the Final Report does not meet the requirement for conducting a soil and groundwater investigation at the former RASP, as specified in the Investigation Order. Therefore, the U.S. ACE is in violation of the Investigation Order. Be advised that the U.S. ACE remains obligated to submit the required investigation work plan, and, with the Executive Officer's approval, conduct the required investigation.

We request that you inform us no later than August 16, 2004 of your proposed schedule for submitting the work plan and conducting the investigation as soon as possible. Please call me at (909) 782-3285, or you may call Robert Holub, Division Chief, at (909) 782-3298.

Sincerely,



for Gerard J. Thibeault  
Executive Officer

cc: Tawny Tran, U.S. Army Corps of Engineers, Los Angeles District  
Allen Curlee, Office of the District Counsel, U.S. Army Corps of Engineers,  
Sacramento  
Jorge Leon, SWRCB, Office of Chief Counsel  
Buck Toler, SAIC, Fountain Valley, CA  
Inland Empire Perchlorate Regulatory Task Force (mailing list attached)